

FILED
IN OPEN COURT

AUG 15 2024

THE CLERK, U.S. DISTRICT COURT
ALEXANDRIA, VIRGINIA

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

MOHAMMED AZHARUDDIN CHHIPA,

Defendant.

Case No. 1:23-CR-97

Count 1: Conspiracy to Provide Material Support or Resources to a Designated Foreign Terrorist Organization (18 U.S.C. § 2339B)

Counts 2-5: Providing and Attempting to Provide Material Support or Resources to a Designated Foreign Terrorist Organization (18 U.S.C. § 2339B)

(18 U.S.C. § 2) (Aiding and Abetting)

Forfeiture Notice

SUPERSEDING INDICTMENT

August 2024 Term — Alexandria, Virginia

THE GRAND JURY CHARGES THAT:

At all times relevant to this Superseding Indictment, unless otherwise specified:

General Allegations

1. The defendant, MOHAMMED AZHARUDDIN CHHIPA, was a United States citizen residing within the Eastern District of Virginia.
2. The Islamic State of Iraq and al-Sham (ISIS) was designated by the United States Secretary of State as a Foreign Terrorist Organization (FTO).
3. From at least in and around October of 2019 and continuing through at least in and around October of 2022, the exact dates being unknown and both dates approximate and inclusive, CHHIPA collected and sent money to female ISIS members in Syria in order to benefit

ISIS in various ways, including by financing the escape of female ISIS members from prison camps and supporting ISIS fighters.

4. In approximately December 2020, CHHIPA began primarily raising funds for and sending money to Unindicted Co-Conspirator 1 (UCC-1). UCC-1 was a British-born ISIS member residing in Syria who was involved in raising funds for prison escapes, terrorist attacks, and ISIS fighters. CHHIPA primarily sent funds to UCC-1 through the use of cryptocurrency.

5. On or about August 15, 2021, CHHIPA collected \$300 in US currency that he subsequently transferred to UCC-1. The money was designated for female ISIS members in prison camps and ISIS fighters.

6. On or about August 16, 2021, UCC-1 confirmed receipt of the money by electronic message.

7. On or about October 28, 2021, CHHIPA collected \$120 in US currency that he subsequently transferred to UCC-1. The money was designated for ISIS fighters.

8. On or about November 3, 2021, UCC-1 confirmed receipt of the money by electronic message.

9. On or about November 18, 2021, CHHIPA collected \$260 in US currency that he subsequently transferred to UCC-1. The money was designated for female ISIS members, ISIS fighters, and for UCC-1's own use.

10. On or about November 24, 2021, UCC-1 confirmed receipt of the money by electronic message.

11. On or about January 13, 2022, CHHIPA collected \$160 in US currency that he subsequently transferred to UCC-1. The money was designated for ISIS fighters.

12. On or about January 26, 2022, UCC-1 confirmed receipt of the money by electronic message.

Count One

Conspiracy to Provide Material Support or Resources to a Designated Foreign Terrorist Organization

(18 U.S.C. § 2339B)

The allegations contained in paragraphs 1 through 12 of the General Allegations are fully incorporated here by reference.

From at least in and around October of 2019 and continuing through at least in and around October of 2022, the exact dates being unknown and both dates approximate and inclusive, in the Eastern District of Virginia and elsewhere, the defendant, MOHAMMED AZHARUDDIN CHHIPA, did knowingly conspire with UCC-1 and others known and unknown to the Grand Jury, to provide “material support or resources,” as that term is defined in Title 18, United States Code, Section 2339A(b), namely, currency and monetary instruments, to a foreign terrorist organization—namely, ISIS, which at all relevant times was designated by the United States Secretary of State as a foreign terrorist organization pursuant to Section 219 of the Immigration and Nationality Act—knowing that ISIS was a designated foreign terrorist organization, that ISIS engages and has engaged in terrorist activity, and that ISIS engages and has engaged in terrorism.

(In violation of Title 18, United States Code, Sections 2339B.)

Count Two

Providing and Attempting to Provide Material Support or Resources to a Designated Foreign Terrorist Organization

(18 U.S.C. § 2339B)

THE GRAND JURY FURTHER CHARGES THAT:

The allegations contained in paragraphs 1 through 12 of the General Allegations are fully incorporated here by reference.

From on or about August 15, 2021 to on or about August 16, 2021, in the Eastern District of Virginia, the defendant, MOHAMMED AZHARUDDIN CHHIPA, aiding and abetting and aided and abetted by others known and unknown to the Grand Jury, did knowingly provide, and attempt to provide, "material support or resources," as that term is defined in Title 18, United States Code, Section 2339A(b), by sending approximately \$300 or more to a foreign terrorist organization—namely, ISIS, which at all relevant times was designated by the United States Secretary of State as a foreign terrorist organization pursuant to Section 219 of the Immigration and Nationality Act—knowing that ISIS was a designated foreign terrorist organization, that ISIS engages and has engaged in terrorist activity, and that ISIS engages and has engaged in terrorism.

(In violation of Title 18, United States Code, Sections 2339B and 2.)

Count Three

Providing and Attempting to Provide Material Support or Resources to a Designated Foreign Terrorist Organization

(18 U.S.C. § 2339B)

THE GRAND JURY FURTHER CHARGES THAT:

The allegations contained in paragraphs 1 through 12 of the General Allegations are fully incorporated here by reference.

From on or about October 28, 2021 to on or about November 3, 2021, in the Eastern District of Virginia, the defendant, MOHAMMED AZHARUDDIN CHHIPA, aiding and abetting and aided and abetted by others known and unknown to the Grand Jury, did knowingly provide, and attempt to provide, "material support or resources," as that term is defined in Title 18, United States Code, Section 2339A(b), by sending approximately \$120 or more to a foreign terrorist organization—namely, ISIS, which at all relevant times was designated by the United States Secretary of State as a foreign terrorist organization pursuant to Section 219 of the Immigration and Nationality Act—knowing that ISIS was a designated foreign terrorist organization, that ISIS engages and has engaged in terrorist activity, and that ISIS engages and has engaged in terrorism.

(In violation of Title 18, United States Code, Sections 2339B and 2.)

Count Four

Providing and Attempting to Provide Material Support or Resources to a Designated Foreign Terrorist Organization

(18 U.S.C. § 2339B)

THE GRAND JURY FURTHER CHARGES THAT:

The allegations contained in paragraphs 1 through 12 of the General Allegations are fully incorporated here by reference.

From on or about November 18, 2021 to on or about November 24, 2021, in the Eastern District of Virginia, the defendant, MOHAMMED AZHARUDDIN CHHIPA, aiding and abetting and aided and abetted by others known and unknown to the Grand Jury, did knowingly provide, and attempt to provide, "material support or resources," as that term is defined in Title 18, United States Code, Section 2339A(b), by sending approximately \$260 or more to a foreign terrorist organization—namely, ISIS, which at all relevant times was designated by the United States Secretary of State as a foreign terrorist organization pursuant to Section 219 of the Immigration and Nationality Act—knowing that ISIS was a designated foreign terrorist organization, that ISIS engages and has engaged in terrorist activity, and that ISIS engages and has engaged in terrorism.

(In violation of Title 18, United States Code, Sections 2339B and 2.)

Count Five

Providing and Attempting to Provide Material Support or Resources to a Designated Foreign Terrorist Organization

(18 U.S.C. § 2339B)

THE GRAND JURY FURTHER CHARGES THAT:

The allegations contained in paragraphs 1 through 12 of the General Allegations are fully incorporated here by reference.

From on or about January 13, 2022 to on or about January 26, 2022, in the Eastern District of Virginia, the defendant, MOHAMMED AZHARUDDIN CHHIPA, aiding and abetting and aided and abetted by others known and unknown to the Grand Jury, did knowingly provide, and attempt to provide, "material support or resources," as that term is defined in Title 18, United States Code, Section 2339A(b), by sending approximately \$160 or more to a foreign terrorist organization—namely, ISIS, which at all relevant times was designated by the United States Secretary of State as a foreign terrorist organization pursuant to Section 219 of the Immigration and Nationality Act—knowing that ISIS was a designated foreign terrorist organization, that ISIS engages and has engaged in terrorist activity, and that ISIS engages and has engaged in terrorism.

(In violation of Title 18, United States Code, Sections 2339B and 2.)

FORFEITURE NOTICE

THE GRAND JURY FURTHER FINDS PROBABLE CAUSE FOR FORFEITURE, AS DESCRIBED BELOW:

Pursuant to Rule 32.2(a) of the Federal Rules of Criminal Procedure, the defendant is hereby notified that upon conviction of any of the offenses alleged in this Indictment, the defendant, MOHAMMED AZHARUDDIN CHHIPA shall forfeit to the United States the following: (1) all assets, foreign or domestic, of any individual, entity, or organization engaged in planning or perpetrating the violation against the United States, citizens or residents of the United States, or their property and all assets, foreign or domestic, affording a source of influence over any such entity or organization; (2) all assets, foreign or domestic, acquired or maintained with the intent and for the purpose of supporting, planning, conducting, or concealing the violation against the United States, citizens or residences of the United States, or their property; (3) all assets, foreign and domestic, derived from, involved in, or used or intended to be used to commit the violation against the United States, citizens or residents of the United States, or their property; and (4) any firearm or ammunition involved in or used in the violation.

Pursuant to 21 U.S.C. 853(p), the defendant shall forfeit substitute property, if, by any act or omission of the defendant, the property referenced above cannot be located upon the exercise of due diligence; has been transferred, sold to, or deposited with a third party; has been placed

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beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

(In accordance with Title 18, United States Code, Sections 924(d) and 981(a)(1)(G); Title 28, United States Code 2461(c); and Federal Rule of Criminal Procedure 32.2(a).)

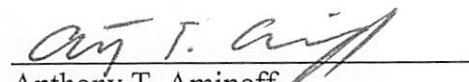
A TRUE BILL:

**Pursuant to the E-Government Act,
The original of this page has been filed
under seal in the Clerk's Office**

FOREPERSON OF THE GRAND JURY

Jessica D. Aber
United States Attorney

By:



Anthony T. Aminoff
Amanda St. Cyr
Assistant United States Attorneys